



3 10 0058

To: Medley
Date: 3/10
From:

U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

February 11, 1991

VIA FEDERAL EXPRESS

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Attention: Mr. Jon Bornholm

Re: CLP Ground-Water Analyses/Phase II
Medley Farm Site
Remedial Investigation Report
Sirriner Project No. G-8026

Dear Jon:

The purpose of this letter and the attached correspondence from the Radian Corporation is to answer questions which were raised by the Agency concerning elevated levels of volatile organic contaminants detected in several ground-water samples (SW1-2, BW1-3, BW4-3 and SW106-3) analyzed during Phase II of the Medley Farm Site RI. This letter should provide additional clarification of explanations made during the review meeting held recently in your office on January 22 in Atlanta.

As discussed, the results of the referenced analyses are startlingly inconsistent with other data from the site. No contaminants were found above CLP detection limits (CRQLs) in any of the previous samples collected and analyzed from the same wells. Samples from three of these locations (SW1-1, BW1-1, BW4-1 and BW4-2) were subjected to complete TCL/TAL CLP analyses during Phase I of the RI. Two (2) of the wells (SW1 and BW1) are background monitoring wells, confirmed to be upgradient of the site by numerous water level measurements made in the expanded network of monitoring wells and piezometers. The location of monitoring well BW4 is the furthest downgradient from the site. The results of two sets of analyses performed during Phase I of the RI and all other data indicate that contaminants from the site have not impacted ground water at BW4.

Although monitoring well SW106 was not installed until Phase II of the RI, a sample was collected and analyzed for VOCs from that location during initial Phase II field efforts to determine whether additional wells were needed at locations further downgradient

Mr. Jon Bornholm
February 11, 1991
Page 2

from the former disposal area. There were also no contaminants detected in that sample (SW106-1). Although the Phase II Work Plan stated that quick turn around analyses would be performed following routine, non-CLP laboratory procedures, SW106-1 was analyzed in full accordance with CLP protocols.

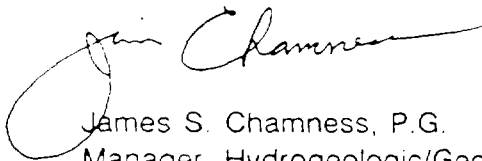
When the results of the final scheduled round of ground-water sampling and analyses included in the Phase II RI work plan were reviewed, the validity of the anomalous results was questioned. Sirrine instructed Radian to perform analyses on duplicate aliquots archived in the lab. In addition, wells SW1, BW1, BW4 and SW106 were re-sampled. The new samples were sent to EcoTek Laboratory Services Incorporated (EcoTek) in Atlanta for TCL-VOA analyses following CLP protocol.

No contaminants were detected in any of the duplicate analyses performed by Radian or the analyses of new samples performed by EcoTek. The inconsistent data was therefore determined to be inaccurate and was not used for further site evaluations.

As explained in the attached letter from Radian, the inconsistent analytical results were confirmed to be the result of cross contamination in the laboratory. It is important to note that this analytical problem would not affect the validity of other samples shown to be clean during these analyses. Since other analytical data from the site were consistent with the results of previous analyses and hydrogeologic conditions characterized by this study, no further re-analyses were needed to complete the RI/FS for this project.

Sincerely,

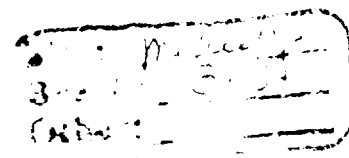
SIRRINE ENVIRONMENTAL CONSULTANTS, INC.



James S. Chamness, P.G.
Manager, Hydrogeologic/Geotechnical Field Services
Project Manager

cc: Ms. Angela Gorman - SCDHEC
Mr. Ted Valerio - National Starch
Ms. Mary Jane Norville - King & Spalding
Mr. Phil Conner - Ogletree, Deakins, Nash, Smoak and Stewart
Ms. Nancy Peterson - Quarles & Brady
Mr. William Gunn - Holcombe, Bomar, Wynn and Gunn
Dr. Dave Hargett - Sirrine
Project File

3 10 0060



February 7, 1991

Mr. Jim Chamness
Sirrinc Environmental Consultants
15 Brenden Way
Greenville, SC 29616

RE: Medley Farms Phase II

Dear Mr. Chamness:

This letter is in response to your questions regarding the volatiles results for your samples BW4-3, SW1-02, BW1-3, and SW106-3. The problem, as I understand, is that the compounds identified and quantitated in these samples were unexpected, due to the location of the wells and previous analyses (Phase I sampling) where the samples were shown not to contain any of the targets of interest.

In order to resolve this, I reviewed the data and had selected "hold vials" of these samples reanalyzed. The reanalysis of these samples clearly show that the Phase II VOAs (BW4-3, SW1-02, BW1-3, and SW106-3) were compromised.

The review of the VOA method blanks and other supporting data, did not indicate that the samples had been contaminated. However, after reviewing the sample analysis log book, it was apparent that these samples had been put into sample queues of separate 12 hour run sequences along with other samples that contained high levels of the target compounds. The samples listed above were either contaminated in the preparation step prior to the introduction into the instrument and/or from carry over through the purge and trap transfer lines. This contamination does not impact the second round of samples shown to be clean.

I apologize for this unfortunate occurrence and will work with you to resolve these issues.

Sincerely,

Denny E. Wagoner, Ph.D.
Technical Director

DEW/jlh.018

cc: C.B. Spittler
J.F. McGaughey
R.G. Baldwin
R.A. Magee